

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MARTIN J. WALSH, Secretary of Labor,
U.S. Department of Labor,

Plaintiff,

V.

**HALO HOMECARE SERVICES, LLC,
et al.,**

Defendants.

Case No. 1:20-cv-00744-MWM

Judge Matthew W. McFarland

MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS

Pursuant to Fed. R. Civ. P. 55(b)(2), Plaintiff Martin J. Walsh, Secretary of Labor, moves this Court for a judgment by default against Defendants Halo Homecare Services, LLC, Halo MGT Productions, LLC, Sharon Ward, and Shana Norris (“Defendants”). By Order dated April 26, 2022, the Clerk of Court issued an entry of default against Defendants. (ECF Doc. 31). A memorandum in support of this Motion, a declaration of undersigned counsel, and a declaration of Nikolai Bogomolov, Assistant District Director with the United States Department of Labor, Wage and Hour Division, are attached in support of this Motion.

Respectfully Submitted,

Dated: November 21, 2022

/s/ Adam M. Lubow
ADAM LUBOW
Trial Attorney
United States Department of Labor
Office of the Solicitor

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OF COUNSEL:

SEEMA NANDA
Solicitor of Labor

CHRISTINE Z. HERI
Regional Solicitor

LEAH A. WILLIAMS
Associate Regional Solicitor

CERTIFICATE OF SERVICE

I certify that on November 21, 2022, a copy of the foregoing was filed with the Court's CM/ECF system and served upon Defendants via United Parcel Service to the following addresses:

Halo MGT Productions, LLC
c/o Renee Marzett
3120 Forest Park Blvd., Apt. 319
Fort Worth, TX 76110-3672

Halo MGT Productions, LLC
c/o Renee Marzett
9106 Solon Drive
Cincinnati, OH 45242

Halo Homecare Services, LLC
c/o Sharon Ward
13138 Coldwater Loop
Clermont, FL 34711-8014

Halo Homecare Services, LLC
c/o Sharon Ward
4235 N. Shore Drive
West Chester, OH 45069

Shana Norris
453 Dewdrop Cir. Apt. D
Cincinnati, OH 45240

/s/ Adam Lubow
ADAM LUBOW